

SALVATORE PERILLO (SP8248)
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Attorney for Defendant, Parkshore
Development Corporation

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY
CAMDEN VICINAGE

PENNSYLVANIA NATIONAL MUTUAL
CASUALTY INSURANCE COMPANY,

Plaintiff,

vs.

PARKSHORE DEVELOPMENT
CORPORATION,

and

CATALINA COVE CONDOMINIUM
ASSOCIATION, INC.,

and

KEEN'S CAULKING AND
WATERPROOFING,

and

ABC CORPORATION 1 through ABC
CORPORATION X, fictitious
names,

Defendants.

Civil Action No.: 07-1331 (RBK-JS)

**AFFIDAVIT OF
KENNETH R. STEINBERG**

- c. Andersen windows and doors were supplied and assembled by Mansion Supply and Universal Supply.
- d. Caulking/sealant work as well as the stucco finish was done by Surfaces/Lanzi;
- e. Mechanical vent hoods for dryers and bathrooms were installed by the HVAC contractors, J. Wittman & Sons and Brittain Electric;
- f. The irrigation system was installed by Paul Chubb Irrigation;
- g. Rough site grading was performed by H. Minuth and final grading was done by Bayview Garden Nurseries;
- h. Foundation construction was performed by Volpe Masonry;
- i. Gutters and leaders were installed by Classic Gutters.

4. Construction of the first unit at Catalina Cove was completed in 1989 and the Certificate of Occupancy issued on December 14, 1989. Construction of the last unit at Catalina Cove was completed in 1998 and the Certificate of Occupancy issued on August 27, 1998.

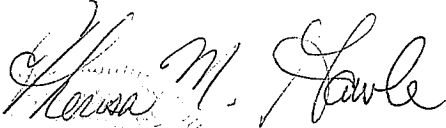
5. In July 1999 Parkshore was notified by Catalina Cove Condominium Association (hereinafter "the Association") that stucco around some of the windows had not been caulked properly

and they were leaking.

6. Parkshore retained a subcontractor, Keen's Caulking and Waterproofing, to perform the recaulking as requested by the Association.


KENNETH R. STEINBERG

Sworn and subscribed to
before me this 27th day of
February 2008.



A Notary Public of the
State of New Jersey

THERESA M. GAWLE
NOTARY PUBLIC OF NEW JERSEY
My Commission Expires March 3, 2008
↳ MARCH 8, 2012